REMARKS

Claims 1-3, 7-10, 12-19, 21, 23-30, 32-34, 37-41, 43-45, 48-52, and 54-57 are now pending in the application, of which claims 1, 24, 37, 48, 50, 51, 52, 54 and 55 are independent. Claims 1, 24, 37-41, 43, 44, 48-52, 54, and 55 were amended to better claim the invention.

Applicants respectfully urge that all of the claims are patentable and in condition for allowance.

Claim Rejections under 35 U.S.C. § 103

In the Office Action claims 1-7, 32-34, 37-45 and 48-55 were rejected under 35 U.S.C. §103(a) as being anticipated by U.S. Patent No. 6,868,526 to Singh (hereafter "Singh") in view of U.S. Patent No. 6,762,757 to Sander (hereafter "Sander").

Although the Examiner does not indicate that claims 8-10, 12-19, 21 and 23-30 were rejected under 35 U.S.C. §103(a) as being anticipated by Singh in view of Sander on page 2 of the Office Action, it appears that these claims were rejected as well.

Applicants respectfully traverse the above rejections.

Claims 4, 5, 6, 42 and 53 have been previously canceled. Therefore, the above § 103 rejection of these claims is moot.

A. Claim 1

Claim 1 recites:

1.   A method comprising:
        receiving an input for selecting a first graphical object in an executable block diagram representing a system, the first graphical object having one or more properties;
        displaying a list of one or more transformation operations performable on the first graphical object for transforming the first graphical object into a second graphical object for the executable block diagram;
        receiving an input for selecting one of the one or more transformation operations;
        applying the selected one of the one or more transformation operations on the first graphical object for creating the second graphical object, the second

graphical object having one or more properties that are different from the one or more properties of the first graphical object; and

incorporating the first graphical object and the second graphical object into the executable block diagram.

The Applicants respectfully submit that Singh and Sander taken either, alone or in any reasonable combination, do not disclose or suggest the following feature of claim 1: *incorporating the first graphical object and the second graphical object into the executable block diagram*.

Singh generally discusses selecting a subsystem block from a graphical elements library. The user drags and drops the selected subsystem block in the model window. *See* Col. 5, line 63 - Col. 6, line 4. The user may modify one or more parameters of the subsystem block copied from the library. *See* Col. 6, lines 39-43. The system then displays the modified subsystem block to the user. *See* Col. 7, lines 30-36. In Singh, only the modified block is incorporated in a block diagram. Singh does not disclose or suggest *incorporating the first graphical object and the second graphical object into the executable block diagram*, as provided in Applicants' claim 1.

Sander does not cure the shortcomings of Singh with respect to disclosing or suggesting incorporating both graphical objects into an executable block diagram. Sander discusses modifying a geometry object. *See* Abstract. Sander discusses generating an initial representation of the geometry object and associating instructions with the initial representation. A graphics device is used to generate a final representation of the geometry object based on the instructions and the initial representation. *See* Col. 5, line 63 – Col. 6, line 5. As illustrated in Figures 1A-1C, 2A, 3A, 3C, 4A and 6A-6D of Sander, only the modified geometry is output, i.e. displayed, to the user. Sander and Singh, taken either alone or in any reasonable combination, do not teach or suggest *incorporating the first graphical object and the second graphical object into the executable block diagram*, as provided in Applicants' claim 1.

Furthermore, the Examiner alleges that Sander is an analogous art of morphing and performing object modifications using transformation and list of modifiers for performing transforming. *See* Office Action, page 3, last paragraph. Applicants respectfully disagree. The present application does <u>not</u> merely concern morphing and modifying geometry objects. Rather, the present application is generally related to <u>executable</u> graphical block diagram models that

represent dynamic systems. Sander's geometry objects are <u>not</u> executable graphical block diagram models.

Applicants respectfully urge that it would <u>not</u> have been obvious to one of skill in the art to combine the teachings of Sander with those of Singh. The teaching of Sander and Singh cannot be combined without further changing their respective functions. Specifically, Singh indicates that the term "graphical block diagram" refers to a set of graphical blocks or nodes and a set of lines (or signals) that carry data between the graphical blocks. Each graphical block typically performs a function and that functions (or equation) is a sub-component of an overall set of equations describing a dynamic system. <u>See</u> Col. 3, lines 54-59. Singh further indicates that using the equations defined by the blocks, the graphical block diagrams can be executed in an interpreted environment to produce simulation results as defined by the graphical blocks and signals in a model. <u>See</u> Col. 4, lines 1-4. On the other hand, Sanders indicates that the term "geometry object" is an object in a graphics application that is comprised of geometrical features that can be manipulated by the graphics application. <u>See</u> Col. 2 lines 1-3. It is not clear how one of skill in the art can apply the teachings of Sander about modifying a geometry object to an executable, i.e. simulatable, graphical block diagram of Singh. Therefore, combining the teachings of Sander and Singh would <u>not</u> yield predictable results as it will be uncertain how the teachings of these references will operate once their respective functions are modified.

For at least the reasons set forth above, the Applicants respectfully urge that Singh and Sander, taken either alone or in any reasonable combination does not disclose or suggest Applicants' claimed ***incorporating the first graphical object and the second graphical object into the executable block diagram***, which is present in claim 1.

Accordingly, Applicants respectfully request that the Examiner withdraw the above §103 rejection of claim 1.

<u>B. Claims 2, 3, 7-10, 12-19, 21, 23 and 56-57</u>

Claims 2, 3, 7-10, 12-19, 21, 23, and 56-57 depend from claim 1 and, as such, incorporate each and every element of claim 1. Applicants respectfully urge that claims 2, 3, 7-10, 12-19, 21, 23, and 56-57 are therefore allowable for at least the reasons presented above with

respect to claim 1. Therefore, Applicants respectfully request that the Examiner withdraw the above §103 rejection of claims 2, 3, 7-10, 12-19, 21, 23, and 56-57.

C. Claims 24-30, 32-34, 37-41, 43-45, 48-52, 54 and 55

Independent claims 24, 37, 48, 50, 51, 52, 54 and 55 recite features similar to the features set forth in claim 1. Claims 24, 37, 48, 50, 51, 52, 54 and 55 include ***incorporating the first graphical object and the second graphical object into the executable block diagram***, which, as noted above, Sander and Singh, taken either singly or in any reasonable combination, fail to disclose or suggest.

For at least the reasons set forth above, Applicants respectfully urge that Singh and Sander, taken either alone or in any reasonable combination fail to disclose or suggest each and every feature of claims 24, 37, 48, 50, 51, 52, 54, and 55.

Dependent claims 25-30, 32-34, 38-41, 43-45, and 49 incorporate each and every element of the independent claim upon which they depend. Thus, Applicants respectfully urge that claims 25-30, 32-34, 38-41, 43-45, and 49 are therefore allowable for at least the reasons presented above with respect to claims 24, 37, 48, 50, 51, 52, 54 and 55.

Therefore, Applicants respectfully request that the Examiner withdraw the above § 103 rejection of claims 24-30, 32-34, 37-41, 43-45, 48-52, 54, and 55.

CONCLUSION

In view of the above comments, Applicants believe the pending application is in condition for allowance and urge the Examiner to pass the claims to allowance. Should the Examiner feel that a teleconference would expedite the prosecution of this application, the Examiner is urged to contact Applicants' attorney at (617) 227-7400.

Please charge any shortage or credit any overpayment of fees to our Deposit Account No. 12-0080, under Order No. MWS-089RCE. In the event that a petition for an extension of time is required to be submitted herewith, and the requisite petition does not accompany this response, the undersigned hereby petitions under 37 C.F.R. §1.136(a) for an extension of time for as many months as are required to render this submission timely. Any fee due is authorized to be charged to the aforementioned Deposit Account.

Dated: October 27, 2008   Respectfully submitted,

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